

Exhibit 1

From: GitHub Developer Support <developer@githubsupport.com>

Sent: Friday, January 26, 2024 7:00 PM

To: Pete Kiousis <pete.kiousis@nexteer.com>

Subject: [GitHub Support] - DMCA takedown notice

Please do not write below this line

Your request has been updated.

You can add a comment by replying to this email.

GitHub Trust & Safety (GitHub Support)



Jan 27, 2024, 12:00 AM UTC

Hi nexteerlegal,

The following content has been disabled and the owners have been notified of the takedown. We will let you know if any of the users file a counter notice to have the content re-enabled:

https://github.com/sweet-dreams-only/EmbeddedSystem_EA4_BMW
https://github.com/sweet-dreams-only/EmbeddedSystem_EA4_GM_T1
https://github.com/sweet-dreams-only/EmbeddedSystem_EA3_PSA_BMPV
https://github.com/sweet-dreams-only/EmbeddedSystem_EA3_FIASA
https://github.com/sweet-dreams-only/EmbeddedSystem_EA3_HAITEC
https://github.com/sweet-dreams-only/EmbeddedSystem_EA3_PSA_CMP
https://github.com/sweet-dreams-only/EmbeddedSystem_EA3_CHRYSLER
https://github.com/sweet-dreams-only/FIASA_TEST_CONFIG_CANOE
https://github.com/sweet-dreams-only/EmbeddedSystem_EA3_GM
https://github.com/sweet-dreams-only/EmbeddedSystem_EA3_BMW
https://github.com/manageme1/ElectricPowerSteering_Roadmap
https://github.com/manageme1/ElectricPowerSteering_RH850_FORD_T3T6
https://github.com/manageme1/ElectricPowerSteering_TMS570_PSA_CMP
https://github.com/manageme1/ElectricPowerSteering_TMS570_PSA_CMP
https://github.com/manageme1/ElectricPowerSteering_TMS570_CHRYSLER_LWR
https://github.com/manageme1/ElectricPowerSteering_RH850_BMW
https://github.com/manageme1/ElectricPowerSteering_RH850_GM_T1XX

https://github.com/manageme1/ElectricPowerSteering_TMS570_HAITEC_LC
https://github.com/manageme1/ElectricPowerSteering_TMS570_FIASA
<https://github.com/rake218/BMW-source-codes>

Please also note that, although your earlier reports did not identify any forked repositories, we thought you may want to know that at least one of the repositories in your takedown notice has been forked. You can see a list of those forked repositories at:

https://github.com/StumHuang/ElectricPowerSteering_TMS570_HAITEC_LC
https://github.com/LiYuanxing/FIASA_TEST_CONFIG_CANOE
https://github.com/wuwzhazha/EmbeddedSystem_EA3_PSA_CMP

If you wish to have any of the files in the forks disabled as well, please investigate and report them in another notice, as they may often contain different material than in the parent repository. You can find out more details about that here:

[GitHub DMCA Takedown Policy - What about forks \(or What's a fork?\)](#)

Lastly, it appears the following content is no longer available:

https://github.com/sweet-dreams-only/EmbeddedSystem_EA4_FORD_T3

Please let us know if you have any other questions.

Regards,
GitHub Trust & Safety

GitHub Trust & Safety (GitHub Support)



Jan 25, 2024, 8:34 PM UTC

Hello nexteerlegal,

Thanks for contacting GitHub Trust & Safety.

We've received your report and will get back to you once our review is complete. In the meantime, please let us know if there is anything else we can help you with.

Regards,
GitHub Trust & Safety

nexteerlegal

Jan 24, 2024, 8:20 PM UTC

Are you the copyright holder or authorized to act on the copyright owner's behalf?

Yes, I am authorized to act on the copyright owner's behalf.

Are you submitting a revised DMCA notice after GitHub Trust & Safety requested you make changes to your original notice?

Yes

Please provide the Zendesk ticket number of your previously submitted notice. Zendesk ticket numbers are 7 digit ID numbers located in the subject line or body of your confirmation email.

2535020

Does your claim involve content on GitHub or npm.js?

GitHub

Please describe the nature of your copyright ownership or authorization to act on the owner's behalf.

Nexteer creates proprietary and confidential code that is safety critical and controls the function of automotive steering systems. this code has been stolen from nexteer and posted repeatedly on github and other sites. Nexteer has filed several discovery requests to github to take down such code in the past.

Please provide a detailed description of the original copyrighted work that has allegedly been infringed. If possible, include a URL to where it is posted online.

Nexteer creates proprietary and confidential code that is safety critical and controls the function of automotive steering systems. this code has been stolen from nexteer and posted repeatedly on github and other sites. Nexteer has filed several discovery requests to github to take down such code in the past

• sweet-dreams-only · GitHub (11 of 12 repositories have Nexteer IP... the exception is “ARM-TMS570LC43x-CCS-HALCoGen”)

- o sweet-dreams-only/EmbeddedSystem_EA4_FORD_T3 · GitHub
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA4_BMW
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA4_GM_T1
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_PSA_BMPV
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_FIASA
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_HAITEC
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_PSA_CMP
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_CHRYSLER
- o GitHub - sweet-dreams-only/FIASA_TEST_CONFIG_CANOE
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_GM
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_BMW: ECU with flexray,
- ...
- o
-
- managemel · GitHub (8 of 9 repositories have Nexteer IP... the exception is “gdal”)
- o GitHub - managemel/ElectricPowerSteering_Roadmap
- o GitHub - managemel/ElectricPowerSteering_RH850_FORD_T3T6
- o GitHub - managemel/ElectricPowerSteering_TMS570_PSA_CMP
- o GitHub - managemel/ElectricPowerSteering_TMS570_PSA_CMP
- o GitHub - managemel/ElectricPowerSteering_TMS570_CHRYSLER_LWR
- o GitHub - managemel/ElectricPowerSteering_RH850_BMW
- o GitHub - managemel/ElectricPowerSteering_RH850_GM_T1XX
- o GitHub - managemel/ElectricPowerSteering_TMS570_HAITEC_LC
- o GitHub - managemel/ElectricPowerSteering_TMS570_FIASA
- o

<https://github.com/rake218/BMW-source-codes>

GitHub - rake218/BMW-source-codes

Contribute to rake218/BMW-source-codes development by creating an account on GitHub.

****What files should be taken down? Please provide URLs for each file, or if the entire repository, the repository’s URL.****

below is a list of files that need to be taken down

- sweet-dreams-only · GitHub (11 of 12 repositories have Nexteer IP... the exception is “ARM-TMS570LC43x-CCS-HALCoGen”)
- o sweet-dreams-only/EmbeddedSystem_EA4_FORD_T3 · GitHub
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA4_BMW

- o GitHub - sweet-dreams-only/EmbeddedSystem_EA4_GM_T1
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_PSA_BMPV
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_FIASA
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_HAITEC
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_PSA_CMP
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_CHRYSLER
- o GitHub - sweet-dreams-only/FIASA_TEST_CONFIG_CANOE
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_GM
- o GitHub - sweet-dreams-only/EmbeddedSystem_EA3_BMW: ECU with flexray,
- ...
- o
-
- managemel · GitHub (8 of 9 repositories have Nexteer IP... the exception is “gdal”)
- o GitHub - managemel/ElectricPowerSteering_Roadmap
- o GitHub - managemel/ElectricPowerSteering_RH850_FORD_T3T6
- o GitHub - managemel/ElectricPowerSteering_TMS570_PSA_CMP
- o GitHub - managemel/ElectricPowerSteering_TMS570_PSA_CMP
- o GitHub - managemel/ElectricPowerSteering_TMS570_CHRYSLER_LWR
- o GitHub - managemel/ElectricPowerSteering_RH850_BMW
- o GitHub - managemel/ElectricPowerSteering_RH850_GM_T1XX
- o GitHub - managemel/ElectricPowerSteering_TMS570_HAITEC_LC
- o GitHub - managemel/ElectricPowerSteering_TMS570_FIASA
- o

<https://github.com/rake218/BMW-source-codes>

GitHub - rake218/BMW-source-codes

Contribute to rake218/BMW-source-codes development by creating an account on GitHub.

****Do you claim to have any technological measures in place to control access to your copyrighted content? Please see our Complaints about Anti-Circumvention Technology if you are unsure.****

Yes

****What technological measures do you have in place and how do they effectively control access to your copyrighted material?****

this code was stolen a few years ago and repeatedly gets posted. since then, many security prevention methods have been put in place.

****How is the accused project designed to circumvent your technological protection measures?****

this code was stolen a few years ago and repeatedly gets posted. since then, many security prevention methods have been put in place.

****Have** you searched for any forks of the allegedly infringing files or repositories? Each fork is a distinct repository and must be identified separately if you believe it is infringing and wish to have it taken down.******

here is one fork we found .

<https://github.com/rake218/BMW-source-codes>

GitHub - rake218/BMW-source-codes

Contribute to rake218/BMW-source-codes development by creating an account on GitHub.

****Is the work licensed under an open source license?****

No

****What would be the best solution for the alleged infringement?****

Reported content must be removed

****Do you have the alleged infringer's contact information? If so, please provide it.****

we have not identified the infringer yet. other than the user names we have already provided.

****I have a good faith belief that use of the copyrighted materials described above on the infringing web pages is not authorized by the copyright owner, or its agent, or the law.****

****I have taken fair use into consideration.****

****I swear, under penalty of perjury, that the information in this notification is accurate and that I am the copyright owner, or am authorized to act on behalf of the**

owner, of an exclusive right that is allegedly infringed.**

I have read and understand GitHub's Guide to Submitting a DMCA Takedown Notice.

So that we can get back to you, please provide either your telephone number or physical address.

nexteer automotive corporation
1272 doris
auburn hills mi
2485638797
pete kiouisis
chief ip counsel

Please type your full legal name below to sign this request.

pete kiouisis

This email is a service from GitHub Support.

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From: GitHub Developer Support <developer@githubsupport.com>
Sent: Tuesday, February 13, 2024 4:19 PM
To: Pete Kiouisis <pete.kiouisis@nexteer.com>
Subject: [GitHub Support] - DMCA takedown notice

Please do not write below this line

Your request has been updated.

You can add a comment by replying to this email.

GitHub Trust & Safety (GitHub Support)



Feb 13, 2024, 9:19 PM UTC

Hello nexteerlegal,

Thanks for contacting GitHub Trust & Safety.

We've received your report and will get back to you once our review is complete. In the meantime, please let us know if there is anything else we can help you with.

Regards,
GitHub Trust & Safety

nexteerlegal



Feb 12, 2024, 7:04 PM UTC

****Are you the copyright holder or authorized to act on the copyright owner's behalf?

Yes, I am authorized to act on the copyright owner's behalf.

****Are you submitting a revised DMCA notice after GitHub Trust & Safety requested
you make changes to your original notice?****

No

****Does your claim involve content on GitHub or npm.js?****

GitHub

****Please describe the nature of your copyright ownership or authorization to act on the owner's behalf.****

Nexteer creates proprietary and confidential code that is safety critical and controls the function of automotive steering systems. this code has been stolen from nexteer and posted repeatedly on GitHub and other sites. Nexteer has filed several discovery requests to GitHub to take down such code in the past.

****Please provide a detailed description of the original copyrighted work that has allegedly been infringed. If possible, include a URL to where it is posted online.****

Nexteer creates proprietary and confidential code that is safety critical and controls the function of automotive steering systems. this code has been stolen from nexteer and posted repeatedly on Nexteer creates proprietary and confidential code that is safety critical and controls the function of automotive steering systems. this code has been stolen from nexteer and posted repeatedly on GitHub and other sites. Nexteer has filed several discovery requests to GitHub to take down such code in the past. and other sites. Nexteer has filed several discovery requests to GitHub to take down such code in the past.

****What files should be taken down? Please provide URLs for each file, or if the entire repository, the repository's URL.****

the user needs to be blocked or removed <https://github.com/greatManager987?tab=repositories>

https://github.com/greatManager987/ElectricPowerSteering_TechnicalDocumentation
https://github.com/greatManager987/EPS_TMS570_GeneralMotors_9BXX
https://github.com/greatManager987/EPS_TMS570_BMW_UKL_MCV
https://github.com/greatManager987/ElectriPowerSteerin_HAITEC
https://github.com/greatManager987/EPS_Chrysler_LWR_TMS570
https://github.com/greatManager987/ElectricPowerSteering_PSA_CMP
https://github.com/greatManager987/ElectricPowerSteering_PSA_BMPV
https://github.com/greatManager987/EPS_RH850_GeneralMotors_T1XX
https://github.com/greatManager987/EPS_RH850_FORD_T3T6
https://github.com/greatManager987/FIAT_EPS_TEST_CFG
https://github.com/greatManager987/EPS_Renesas_BMW_UKL
https://github.com/greatManager987/BMW_EPS_RH850_Archi

Do you claim to have any technological measures in place to control access to your copyrighted content? Please see our <a href="<https://docs.github.com/articles/guide-to-submitting-a-dmca-takedown-notice#complaints-about-anti-circumvention-technology>">Complaints about Anti-Circumvention Technology if you are unsure.

Yes

What technological measures do you have in place and how do they effectively control access to your copyrighted material?

this code was stolen a few years ago and repeatedly gets posted. since then, many security prevention methods have been put in place.

How is the accused project designed to circumvent your technological protection measures?

this code was stolen a few years ago and repeatedly gets posted. since then, many security prevention methods have been put in place.

<a href="<https://docs.github.com/articles/dmca-takedown-policy#b-what-about-forks-or-whats-a-fork>">Have you searched for any forks of the allegedly infringing files or repositories? Each fork is a distinct repository and must be identified separately if you believe it is infringing and wish to have it taken down.

no forks noticed yet

Is the work licensed under an open source license?

No

What would be the best solution for the alleged infringement?

Reported content must be removed

Do you have the alleged infringer's contact information? If so, please provide it.

we have not identified the infringer yet. other than the user names we have already provided.

I have a good faith belief that use of the copyrighted materials described above on the infringing web pages is not authorized by the copyright owner, or its agent, or the law.

**I have taken <a href="<https://www.lumendatabase.org/topics/22>">fair use into

consideration.**

I swear, under penalty of perjury, that the information in this notification is accurate and that I am the copyright owner, or am authorized to act on behalf of the owner, of an exclusive right that is allegedly infringed.

I have read and understand GitHub's <a href="<https://docs.github.com/articles/guide-to-submitting-a-dmca-takedown-notice/>">Guide to Submitting a DMCA Takedown Notice.

So that we can get back to you, please provide either your telephone number or physical address.

nexteer automotive corporation
1272 doris
auburn hills mi
2485638797
pete kiouisis
chief ip counsel

Please type your full legal name below to sign this request.

pete kiouisis

This email is a service from GitHub Support.

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